

FEB 20 2024

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA

v.

(1) SONNY EDMOND LUCAS
(2) DENNIE GERALD KEITH
Defendants

DOCKET NO. 3:24-cr-25-FDW

BILL OF INDICTMENT

Violations: 21 U.S.C. § 841(a)(1)
21 U.S.C. § 846
18 U.S.C. § 924(c)
18 U.S.C. § 922(g)(1)
18 U.S.C. § 2

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Distribute Methamphetamine)

On or about June 28, 2023, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the defendants,

(1) SONNY EDMOND LUCAS, and
(2) DENNIE GERALD KEITH,

did knowingly and intentionally combine, conspire, confederate, and agree with each other and with other persons, known and unknown to the Grand Jury, to distribute and possess with the intent to distribute a controlled substance, which violation involved methamphetamine (actual), a Schedule II controlled substance; in violation of Title 21, United States Code, Section 841(a)(1).

Quantity of Methamphetamine Involved

It is further alleged that, with respect to the conspiracy offense charged in Count One, five (5) grams or more of methamphetamine (actual) is attributable to defendants (1) SONNY EDMOND LUCAS and (2) DENNIE GERALD KEITH, as a result of their own conduct and the conduct of other conspirators reasonably foreseeable to them. Accordingly, Title 21, United States Code, Section 841(b)(1)(B) applies.

All in violation of Title 21, United States Code, Section 846.

Prior Conviction Pursuant to Title 21, United States Code, Sections 841(b)(1)(B) and 851

Before defendant **(2) DENNIE GERALD KEITH** committed the offense charged in Count One, he had a final conviction for a serious drug felony, namely, conspiracy to distribute a controlled substance, in violation of 21 U.S.C. §§ 846 and 841(a)(1), for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the offense charged in Count One.

COUNT TWO

(Distribution of Methamphetamine)

On or about June 28, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendants,

**(1) SONNY EDMOND LUCAS, and
(2) DENNIE GERALD KEITH,**

aiding and abetting one another, did knowingly and intentionally distribute a controlled substance, to wit: methamphetamine (actual), a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

Quantity of Methamphetamine Involved

With respect to Count Two, five (5) grams or more of methamphetamine (actual) is attributable to defendants **(1) SONNY EDMOND LUCAS** and **(2) DENNIE GERALD KEITH**. Accordingly, Title 21, United States Code, Section 841(b)(1)(B) applies.

Prior Conviction Pursuant to Title 21, United States Code, Sections 841(b)(1)(B) and 851

Before defendant **(2) DENNIE GERALD KEITH** committed the offense charged in Count Two, he had a final conviction for a serious drug felony, namely, conspiracy to distribute a controlled substance, in violation of 21 U.S.C. §§ 846 and 841(a)(1), for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the offense charged in Count Two.

COUNT THREE

(Possession with Intent to Distribute Methamphetamine, Fentanyl, and Cocaine)

On or about September 30, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(1) SONNY EDMOND LUCAS,

did knowingly and intentionally possess with the intent to distribute one or more controlled substances, which violation involved (i) methamphetamine (actual), (ii) a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4 piperidinyl] propanamide (“fentanyl”), and (iii) a mixture and substance containing a detectable amount of cocaine, all Schedule II controlled substances; in violation of Title 21, United States Code, Section 841(a)(1).

Quantity of Methamphetamine Involved

With respect to defendant **(1) SONNY EDMOND LUCAS**, the offense charged in Count Three involved five (5) grams or more of methamphetamine (actual), a Schedule II controlled substance. Accordingly, Title 21, United States Code, Section 841(b)(1)(B) applies.

Quantity of Fentanyl and Cocaine Involved

With respect to defendant **(1) SONNY EDMOND LUCAS**, the offense charged in Count Three involved a quantity of fentanyl and cocaine, both Schedule II controlled substances. Accordingly, Title 21, United States Code, Section 841(b)(1)(C) applies.

COUNT FOUR

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about September 30, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(1) SONNY EDMOND LUCAS,

did knowingly possess a firearm in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, that is, Possession with Intent to Distribute Controlled Substances, a violation of Title 21, United States Code, Section 841(a)(1), as set forth in Count Three of this Bill of Indictment, incorporated by reference herein; in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT FIVE

(Possession of a Firearm by a Convicted Felon)

On or about September 30, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(1) SONNY EDMOND LUCAS,

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess at least one firearm, to wit:

- A North American Arms, Model NAA22, .22 caliber revolver;
- An SCCY, Model CPX-2, 9mm pistol;
- A Colt, Model Defender, .45 caliber pistol;
- A Jimenez Arms, Model J.A. 25, .25 caliber pistol;
- Harrington and Richardson, Model 922, .22 caliber revolver;

in and affecting interstate commerce; in violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

Notice is hereby given of 21 U.S.C. § 853, 18 U.S.C. § 924, and 28 U.S.C. § 2461(c). The following property is subject to forfeiture in accordance with Section 853, 924, and/or 2461(c):

- a. All property which constitutes or is derived from proceeds of the violations set forth in this bill of indictment;
- b. All property used or intended to be used in any manner or part to commit or facilitate such violations;
- c. All firearms or ammunition involved or used in such violations; and
- d. If, as set forth in 21 U.S.C. § 853(p), any property described in (a), (b), or (c) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant/s to the extent of the value of the property described in (a), (b), and (c).

The Grand Jury finds probable cause that the following property seized on or about September 30, 2023, during the course of the investigation, is subject to forfeiture on the grounds noted above:

- (a) Currency in the amount of \$2,908;
- (b) A North American Arms, Model NAA22, .22 caliber revolver (SN: L131807) and any accompanying ammunition;
- (c) An SCCY, Model CPX-2, 9mm pistol (SN: 141640) and any accompanying ammunition;
- (d) A Colt, Model Defender, .45 caliber pistol (SN: DR08065) and any accompanying ammunition;
- (e) A Jimenez Arms, Model J.A. 25, .25 caliber pistol (SN: 059623) and any accompanying ammunition; and
- (f) A Harrington and Richardson, Model 922, .22 caliber revolver (SN: N235547) and any accompanying ammunition.

A TRUE BILL



FOREPERSON

DENA J. KING
UNITED STATES ATTORNEY

A handwritten signature in cursive script, appearing to read "Alfredo de la Rosa", written over a horizontal line.

ALFREDO DE LA ROSA
ASSISTANT UNITED STATES ATTORNEY